

**IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF OKLAHOMA**

SAMANTHA RICKS,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No.: CIV-24-739-PRW
	)	
BOB W. HUGHEY, et al.,	)	
	)	
	)	
Defendants.	)	

**DEFENDANTS’ JOINT MOTION TO STRIKE PLAINTIFF’S APPLICATION  
FOR CONTEMPT AND SANCTIONS**

Defendants City of El Reno, City of Stillwater, Payne County Sheriff’s Department, Ryan Dean Clopton, Jacob Secrest, Chris West, Kevin Ward, Paul Reynolds, Sheila Preno, Adam Flowers, Phil Blevens, Marie Hirst, Michelle Garrison, Canadian County Sheriff Department, and Gary E. Miller Children’s Justice Center (“Defendants”) hereby respectfully jointly submit this Motion to Strike Plaintiff’s “Emergency Application for Contempt and Request for Sanctions” filed at Doc. 28. In support of this Motion, Defendants state as follows:

1. On July 22, 2024, Plaintiff filed suit pro se. (Doc. 1) She brought suit against over forty defendants. She purported to file suit under the “[U]nited [S]tates [C]onstitution [A]rticles 1, 7, 9, and 10” and the “common law of the land.” (Doc. 1, p. 6). As matters of controversy, she listed “trespass; kidnapping; extortion; unlawful incarceration; robbery; fraud; forced contract not held; theft of property; false statements; perjury; subornation of perjury; slander; mental anguish; assault and battery; property damage; R.I.C.O.;

deprivation of rights; conspiracy against rights under color of law at minimum[.]” (Doc. 1, p. 6).

2. On September 9, 2024, the City of El Reno and the City of Stillwater both filed Motions to Dismiss as service was not properly executed and Plaintiff failed to state a claim against either City pursuant to Fed. R. Civ. P. 12(b)(6) and other arguments. (Docs. 9 & 13).

3. Plaintiff did not respond to these motions by the due date of September 30, 2024, nor has she filed a response as of the date of this filing.

4. On December 2, 2024, Plaintiff filed a Notice titled “Verdict” in which she claimed that a jury found in her favor and awarded her custody of her children and \$10 billion dollars. (Doc. 17).

5. On December 10, 2024, Defendants Payne County Sheriff’s Department, Ryan Dean Clopton, Jacob Secrest, Chris West, Kevin Ward, Paul Reynolds, Sheila Preno, Adam Flowers, Phil Blevens, Marie Hirst, Michelle Garrison, Canadian County Sheriff Department, and Gary E. Miller Children’s Justice Center filed Motions to Dismiss as Plaintiff failed to properly serve the Defendants and because the Complaint failed to state a claim against any of these Defendants pursuant to Fed. R. Civ. P. 12(b)(6), among other arguments. (Docs 19, 21).

6. Plaintiff did not respond to these motions by the due date of December 31, 2024, nor has she filed a response as of the date of this filing.

7. Plaintiff is apparently aware of the filing of these Motions to Dismiss as she referenced them in a March 14, 2025 filing titled “Order: Court Clerk Joan Kane” at Doc.

26 when she asked the Court Clerk to “return-to-sender(s) the MOTION(s) TO DISMISS” filed by counsel for these Defendants. (Doc. 26).

8. Despite the pending motions to dismiss, Plaintiff has repeatedly filed documents with the Court, including a purported “Verdict” finding in her favor and that she was entitled to \$10,000,000,000 to be paid within thirty (30) days. (Doc. 17) and a purported Notice Judgment Hearing purportedly setting a hearing at the Western District of Oklahoma at 9:35 a.m. on February 22, 2025 (a Saturday) (Doc. 23), among other similar documents. Additionally, on March 10, 2025, she filed a notice purporting to hold anyone liable for any trespass in the amount of a \$1 per second. (Doc. 24).

9. Most recently, individuals purportedly acting on behalf of Plaintiff<sup>1</sup> personally hand-delivered a Letter of Demand for Monetary Judgment to the offices of multiple defendants and even their attorneys. This letter claimed that the judgment for \$10 billion dollars was owned to her “as seen on and for the public record at ‘Federal Court’ District Court united states for western Oklahoma.” (Docs. 29-37).

10. Plaintiff filed these letters with the Court on April 8, 2025, along with “affidavits of service.”. (Docs. 29-37). On this same day, she filed an Emergency Application for Contempt and Motion for Sanctions. (Doc. 28). This Application is nearly completely blank besides the document title; thus, it is unclear what exactly occurred that Plaintiff believes would be considered contempt or sanctionable, nor does she include any

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<sup>1</sup> It is not clear to the undersigned whether Plaintiff herself was among these individuals.

statement as to who allegedly committed such act. The Application does, however note that she requires compensation of one dollar for every second for any trespass.

11. In order for contempt or sanctions to even be applicable, a valid Court Order must exist for the defendants to have disobeyed. *See Reliance Ins. Co. v. Mast Const. Co.*, 159 F.3d 1311, 1315 (10th Cir. 1998) (“To prevail in a civil contempt proceeding, the plaintiff has the burden of proving, by clear and convincing evidence, that a valid court order existed, that the defendant had knowledge of the order, and that the defendant disobeyed the order.”). No such Order exists here. (See Docket Sheet).

12. Plaintiff seems to believe that her “Judgment” is binding on the defendants in this case. It clearly is not. Only the Court has authority to enter judgment. Since no valid or enforceable judgment exists, any motion for sanctions or contempt against these defendants is improper and must be stricken. Further, the Motion fails to clearly state what issue she is complaining of or how she may be entitled to relief.

WHEREFORE, premises considered, Defendants respectfully request that Court enter an Order striking the “Emergency Application for Contempt and Request for Sanctions” filed at Doc. 28 from the record. Rather, Defendants respectfully request that all pending Motions to Dismiss be granted.

Respectfully submitted,

s/ Jessica L. Dark

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CANADIAN COUNTY SHERIFF  
DEPARTMENT, AND GARY E. MILLER  
CHILDREN'S JUSTICE CENTER**

**CERTIFICATE OF SERVICE**

I certify that on the 17<sup>th</sup> day of April, 2024, I electronically transmitted the foregoing document to the Clerk of Court using the ECF system for filing and the transmittal of a Notice of Electronic Filing to all counsel who have entered an appearance in this action and that a copy has been mailed to the pro se Plaintiff at the address below:

Samantha Ricks  
General Delivery  
Shobonier, IL 62885

*Pro Se*

s/ Jessica L. Dark

Jessica L. Dark